

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ERNEST STANDLEY,
Plaintiff,

V.

**NABORS INDUSTRIES, INC., AND
EXPRESS PAYROLL, INC.,**
Defendants.

§
§
§
§
§
§
§
§

**CIVIL ACTION NO.: 4:14-CV-2057
JURY DEMANDED**

DEFENDANT'S NOTICE OF INITIAL DISCLOSURE

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, Defendant, **EXPRESS PAYROLL, INC.** ("Defendant"), hereby submits its Notice of Initial Disclosure and would respectfully show the Court as follows:

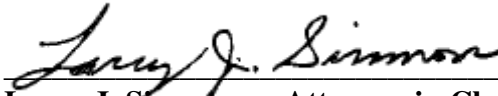
I.

On December 15, 2014, Defendant served its Initial Disclosure statement to all parties, in accordance with the local rules and the Federal Rules of Civil Procedure. Defendant will continue to supplement as circumstances permit and as required by the governing rules.

II.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that the Court take notice of such disclosure and for such other and further relief to which Defendant may be entitled.

Respectfully submitted,



Larry J. Simmons – Attorney in Charge

State Bar No. 00789628

ljsimmons@germer.com – Email

B. Eliot New – Of Counsel

State Bar No. 24060328

enew@germer.com – Email

GERMER PLLC

P.O. Box 4915

Beaumont, Texas 77704

(409) 654-6700 - Telephone

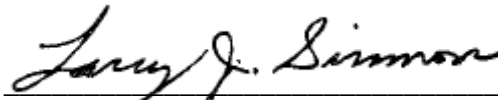
(409) 835-2115 - Facsimile

COUNSEL FOR DEFENDANT

EXPRESS PAYROLL, INC.

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of December, 2014, a true and correct copy of **Defendant's Notice of Initial Disclosure** was forwarded to all known counsel of record pursuant to the Federal Rules of Civil Procedure.



Larry J. Simmons